



The Commission has requested Intrado to file its VoIP 9-1-1 solutions that it is presently offering to VoIP Service Providers. In order to best explain the nuances of each solution, we are not only submitting the marketing collateral, but we are also providing further documentation via this cover page.

Currently, Intrado has deployed seven VoIP Emergency Calling Service (ECS) customers, with the oldest customer having been deployed for over 20 months. The VoIP ECS service is outlined in the documentation provided and is the solution that delivers emergency calling capabilities to VoIP subscribers including both nomadic users as well as those users with foreign (outside of rate center) telephone numbers.

Just as Intrado was first to market with VoIP ECS, we have continued to innovate and develop our VoIP solutions, leading to the recent launch of Intrado's V9-1-1 Mobility Service in January 2005. This service enables the delivery of a VoIP subscribers address and call back number to the most geographically relevant Public Safety Answering Point (PSAP) in the event of a 9-1-1 call. This service also includes the ability for a user to update their address to the VoIP Provider and have it provisioned into the Intrado systems within 15 minutes of submission, thereby accommodating the nomadic capability inherent in their VoIP service.

The V9-1-1 Mobility Service outlined in the attached documentation takes a very large and important step towards delivering full E9-1-1 for VoIP subscribers; however, it is important to note that the solution deployment and full functionality of the service is not without certain challenges. Inherent in the service is the delivery of the VoIP 9-1-1 call into the native 9-1-1 network and the delivery of address information to a call taker. In the interest of full disclosure and transparency, it is important to draw out the following challenges and dependencies toward delivering full E9-1-1 for VoIP subscribers:

- Access through cooperation and agreements with the Incumbent Local Exchange Carriers (ILECs) to network elements (Selective Routers and regional address (ALI) databases are required
 - These access requirements are currently being addressed; however, they may not be consistent across the country, which in turn may require alternative access methods by region
- Multiple state and local jurisdictions, as well as PSAPs have expressed/requested alternative requirements for how they would like to receive VoIP 9-1-1 calls
- Both economic issues and market timing issues must be taken into account by both Intrado and VoIP Providers given the potential for multiple and potentially disparate access requirements to network elements.

Intrado is currently deploying V9-1-1 Mobility Service for our customers and has plans to continue migrating existing VoIP ECS customers towards the V9-1-1 service. This migration will evolve as the industry and Intrado work to increase network element access coverage through business agreements, infrastructure investment and access point availability. Intrado's current and future V9-1-1 deployments also include VoIP ECS as a component of the service which will ensure a base level of emergency calling support is available in areas where full V9-1-1 Mobility Service is not fully enabled due to access.

Within the current environment, Intrado remains committed to delivering the highest level of emergency calling and 9-1-1 support to its customers. As we continue to deploy VoIP solutions to our customers, we welcome and appreciate the continued dialogue with the Commission.